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IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA

2016 SEP -6 P 2:23

Seron Smith Bibb Cori FaeFull name and prison name of
Plaintiff(s)

v.

William BennettJohn HuttonWillie ThomasDebra ToneyJeffery DunnCheryl PriceName of person(s) who violated your
constitutional rights. (List the names
of all the person.)CIVIL ACTION NO. 2:16-CV-723-WW-SRW
(To be supplied by Clerk of U.S. District
Court)

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court dealing with the same or
similar facts involved in this action? YES ☒ No ☒B. Have you begun other lawsuits in state or federal court relating to your
imprisonment? YES ☐ NO ☒C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there
is more than one lawsuit, describe the additional lawsuits on another piece of paper,
using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) _____

Defendant(s) _____

2. Court (if federal court, name the district; if state court, name the county)

3. Docket number _____
4. Name of judge to whom case was assigned _____
5. Disposition (for example: was the case dismissed? Was it appealed? Is it still pending ?) _____
6. Approximate date of filing lawsuit _____
7. Approximate date of disposition _____

II. PLACE OF PRESENT CONFINEMENT Bibb Correctional Facility

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED Bibb Corr. Facility

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

	NAME	ADDRESS
1.	<u>William Bennett</u>	<u>565 Bibb Ln. Brent, AL.</u>
2.	<u>John Hutton</u>	<u>565 Bibb Ln. Brent, AL.</u>
3.	<u>Willie Thomas</u>	<u>565 Bibb Ln Brent, AL.</u>
4.	<u>Debra Toney</u>	<u>565 Bibb Ln. Brent, AL.</u>
5.	<u>Jeffery Dunn</u>	<u>301 S. Ripley Montg. AL</u>
6.	<u>Cheryl Price</u>	<u>301 S. Ripley Montg. AL</u>

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED 5-30-16

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: Reckless Endangerment and Deliberate Indifference

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

On Memorial Day, 5-30-16, I was stabbed multiple times by Kevin Lucy on Westside main yard. Nearly 2,000 inmates on yard @ one time and not (1) officer on yard, only one nurse in Edorm and she is very pregnant and couldn't help.

GROUND TWO: Criminal Negligence

SUPPORTING FACTS: When inmate began stabbing me I had no D.O.C. Support and it took another inmate to get Kevin Lucy off top of me. I was pinned to ground and couldn't move! Yet I got wrote up for fighting with a weapon and Kevin Lucy got found not guilty

GROUND THREE: Cruel and Unusual Punishment

SUPPORTING FACTS: After being rushed to free world hospital in Tuscaloosa, I was brought back 2 days later with a healing collapsed lung and been placed in the Segregation unit. 3 mental health inmates all cut themselves in cell with me, while I was 'under' investigation and recently they put a member of Kevin Lucy's gang in cell with me. I fear Capt. Hutton is trying to get me seriously hurt like he threatened me he was gonna do, for calling the

#66 or 91 Hotline on them. While in Seg. another inmate set a fire, me and another inmate passed out! I just had lung surgery! Help me!

Ground Four

Deliberate Indifference

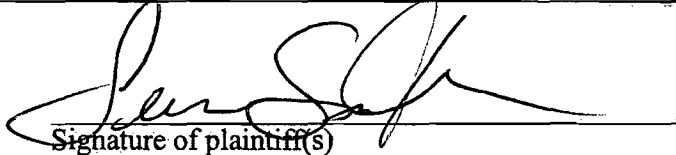
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Supporting Facts:

I've explained to Captain Stutton personally that the guy that stabbed me has "62 Brim Bloods", threatening me and 3 times he's put one (Blood) in cell with me. One's name was Bullard and I was in INV Seg. and he was Disciplinary Seg, we weren't even supposed to be in same cell and I brought this to Capt. attention, dude tried to assault me before being moved. To keep this brief C. Moreland another 'Blood' was placed in my cell 8/16/16 and 8/26/16 I reported to officer's Williams and Ausborn that he (Moreland) was in cell making death threats, he did it in front of officer Ausborn and Sgt. Fulner. He was removed from cell by Sgt. Fulner. Same night, because of Deliberate Indifference and negligence, same inmate was allowed to come to another dorm during nightly walks and spit in my face and kick me, blatant assault. DDC did nothing to him. Officer Dickerson stopped inmate from doing more damage. Officer Allen who worked that dorm did nothing to stop him from assaulting me!

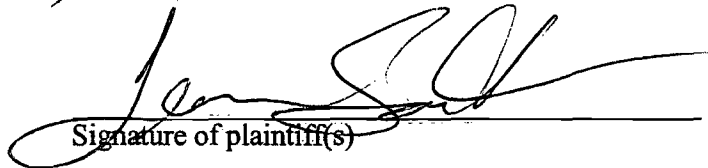
VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

I would like to have disciplinary removed from my
file. Removed out of Segregation and have steel
plate removed off all segregation windows, they've
recently been welded and no air can circulate.
I want immediate transfer to Bullock Cor. to be evaluated.


Signature of plaintiff(s)

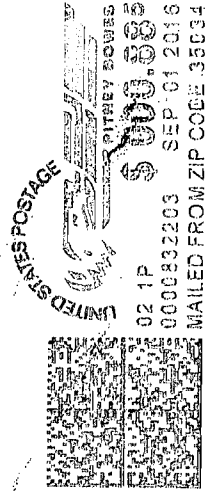
I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 25, 2016
(Date)


Signature of plaintiff(s)

Serun Smith #183558
565 Bibb Ln. D2-3
Brent, AL 35834

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AL 350
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Office of Clerk
United States District Court
Middle District

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